

**MARTIN CLEARWATER & BELL LLP**  
COUNSELORS AT LAW

245 MAIN STREET, SUITE 501, WHITE PLAINS, NY 10601  
TELEPHONE (914) 328-2969 FACSIMILE (914) 328-4056  
[www.mcblaw.com](http://www.mcblaw.com)

CHRISTOPHER A. TERZIAN  
PARTNER

DIRECT DIAL: (914) 467-7779  
E-MAIL: [christopher.terzian@mcblaw.com](mailto:christopher.terzian@mcblaw.com)

NEW YORK, NY  
EAST MEADOW, NY  
WHITE PLAINS, NY  
ROSELAND, NJ  
ROCHESTER, NY  
NORWALK, CT

August 2, 2024

**Via ECF**

The Hon. Chief Judge Margo K. Brodie  
United States District Court for the New York Eastern District  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: **State Farm Mutual Automobile Insurance Company, et al. v. Metro Pain  
Specialists P.C., et al.**  
Case Number 1:21-CV-05523-MKB-PK

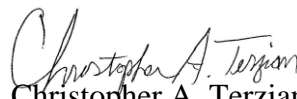
Dear Judge Brodie:

This firm represents Dr. Michael G. Alleyne in a medical malpractice matter pending in New York State Supreme Court, Kings County. We have been contacted by Mr. Christopher Cook, Esq. of Katten, Muchin and Rosenman, LLP, attorneys for State Farm in the above-captioned matter regarding a subpoena duces tecum his law firm served on Dr. Alleyne. We will represent him for purposes of this subpoena. As Your Honor is aware, he is a non-party to this case before you. We respectfully request that you stay the Order to Show Cause returnable August 2, 2024 seeking to hold Dr. Alleyne in contempt for failing to comply with the subpoena. He is currently outside the USA. Mr. Cook and I are working together to resolve the matter without the need for judicial intervention. If Your Honor grants this request, we will provide you with an update on the status of our discussions by August 14, 2024.

Thank you for your attention to this request.

Respectfully yours,

MARTIN CLEARWATER & BELL LLP

  
Christopher A. Terzian

Cc: [Christopher.Cook@katten.com](mailto:Christopher.Cook@katten.com)